

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 25-cr-20102-RAR

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILBER ROSENDO NAVARRO-ESCOBAR,

Defendant.

DEFENDANT'S MOTION TO SEAL

Defendant, WILBER ROSENDO NAVARRO-ESCOBAR, by and through his undersigned counsel, files his Motion to Seal and respectfully requests that Defendant's *Ex-Parte* Motion Requesting Authorization of Expenditure of Criminal Justice Act Funds for Travel and any resulting Order therefrom be SEALED, as the information contained therein is defense work product.

WHEREFORE, undersigned counsel moves this Honorable Court to enter its Order granting this Motion to Seal, for the foregoing reasons.

DATED: July 6, 2025.

Respectfully submitted,

Donet, McMillan & Trontz, P.A.

By: /s/ David A. Donet, Jr.

David A. Donet, Jr., Esq.
Florida Bar No.: 128910
Attorney for Defendant

[Certificate of Service on next page]

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 6, 2025, undersigned counsel electronically filed the foregoing Defendant's Motion to Seal with the Clerk of the Court using CM/ECF, and that copies thereof were emailed to Defendant's co-counsel, Gary E. Proctor, Esq., at garyeproctor@gmail.com and to Mitigation Specialist, Lisa McDermott, at lisamcdermott007@gmail.com.

Donet, McMillan & Trontz, P.A.

By: /s/ David A. Donet, Jr.

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